

**AFFIDAVIT OF MAI HUANG IN SUPPORT OF  
APPLICATION FOR SEARCH WARRANT**

I, Mai Huang, being first duly sworn, hereby depose and state as follows:

**A. Introduction and Agent Background**

1. I make this affidavit in support of an application for a search warrant for certain accounts controlled by the free web-based electronic mail service provider known as Yahoo!, Inc. ("Yahoo"), headquartered at 701 First Avenue, Sunnyvale, CA 94089. The account to be searched is **E\_Tonia@yahoo.com**, which is further described in the following paragraphs and in Attachment A. As set forth herein, there is probable cause to believe that on the computer systems of Yahoo, there exists evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 666 (Theft Concerning Programs Receiving Federal Funds).

2a. I have been a criminal investigator for the United States Agency for International Development ("USAID") Office of the Inspector General ("OIG") since September 2001. Previously, I served as a criminal investigator for the United States Environmental Protection Agency Regional Office in Dallas, Texas from September 1997 until September 2001. In that capacity, I conducted criminal investigations of violations of federal environmental regulations within Texas, Louisiana, Oklahoma, New Mexico, and Arkansas. In my present assignment as USAID/OIG investigator, my responsibilities include conducting investigations of waste, fraud and abuse in USAID programs and operations. In addition, I conduct investigations of serious misconduct by USAID employees including personal service contractors. I served in the USAID Washington, D.C. headquarters office

from September 2001 until January 2003; in Budapest, Hungary from January 2003 until October 2005; in Frankfurt, Germany from October 2005 until May 2007; and I am currently serving in Pretoria South Africa.

2b. I completed the Basic Criminal Investigations Course at the Federal Law Enforcement Center from September 1997 until December 1997. In addition, I completed training in investigations for Office of Inspector General, Interviewing Techniques and Interrogation, Public Corruption, and Procurement Fraud. I have written affidavits for search warrants and subpoenas as an investigator with the U.S. Environmental Protection Agency and USAID. I have executed and participated in numerous search and arrest warrants with the U.S. Environmental Protection Agency and USAID. And I have served as the leader for the evidence collection team during search warrants with the U.S. Environmental Protection Agency.

3. In my training and experience, I have learned that Yahoo is a company that provides free web based Internet electronic mail ("e-mail") access to the general public, and that stored electronic communications, including opened and unopened e-mail for Yahoo subscribers may be located on the computers of Yahoo. Further, I am aware that computers located at Yahoo contain information and other stored electronic communications belonging to unrelated third parties. Accordingly, this affidavit and application for search warrant seek authorization to seize the records and information specified in Attachment A.

**B. Search Procedure**

4. In order to facilitate seizure by law enforcement of the records and information described in Attachment A, this affidavit and application for search warrant seek authorization to permit employees of Yahoo to assist agents in the execution of this warrant. In executing this warrant, the following procedures will be implemented:

- a. The search warrant will be presented to Yahoo personnel who will be directed to isolate those accounts and files described in Section II of Attachment A;
- b. In order to minimize any disruption of computer service to innocent third parties, Yahoo employees will create an exact duplicate of the computer accounts and files described in Section II of Attachment A, including an exact duplicate of all information stored in the computer accounts and files described in Section II of Attachment A. With Yahoo's consent, law enforcement personnel trained in the operation of computers may provide support for this process and/or may create the exact duplicate described above;
- c. Yahoo employees will provide the exact duplicate in electronic form of the accounts and files described in Section II of the Attachment A and all information stored in those accounts and files to the agent who serves this search warrant; and
- d. Law enforcement personnel will thereafter review all information and records received from Yahoo employees to determine the information to be seized by law enforcement personnel pursuant to Section III of Attachment A.

**C. Background Regarding Computers, the Internet, and E-Mail**

5. The term "computer" as used herein is defined in 18 U.S.C. § 1030(e)(1), and includes an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device.

6. I have had both training and experience in the investigation of computer-related crimes. Based on my training, experience and knowledge, I know the following:

a. The Internet is a worldwide network of computer systems operated by governmental entities, corporations, and universities. In order to access the Internet, an individual computer user must subscribe to an access provider, which operates a host computer system with direct access to the Internet. The world wide web ("www") is a functionality of the Internet which allows users of the Internet to share information;

b. With a computer connected to the Internet, an individual computer user can make electronic contact with millions of computers around the world. This connection can be made by any number of means, including modem, local area network, wireless and numerous other method; and

c. E-mail is a popular form of transmitting messages and/or files in an electronic environment between computer users. When an individual computer user sends e-mail, it is initiated at the user's computer, transmitted to the subscriber's mail server, then transmitted to its final destination. A server is a computer that is attached to a dedicated

network and serves many users. An e-mail server may allow users to post and read messages and to communicate via electronic means.

**D. Yahoo**

7. Based on my training and experience, I have learned the following about Yahoo:

- a. Yahoo is an e-mail service which is available free of charge to Internet users. Subscribers obtain an account by registering on the Internet with Yahoo. Yahoo requests subscribers to provide basic information, such as name, gender, zip code and other personal/biographical information. However, Yahoo does not verify the information provided;
- b. Yahoo maintains electronic records pertaining to the individuals and companies for which they maintain subscriber accounts. These records include account access information, e-mail transaction information, and account application information;
- c. Subscribers to Yahoo may access their accounts on servers maintained and/or owned by Yahoo from any computer connected to the Internet located anywhere in the world;
- d. Any e-mail that is sent to a Yahoo subscriber is stored in the subscriber's "mail box" on Yahoo's servers until the subscriber deletes the e-mail or the subscriber's mailbox exceeds the storage limits preset by Yahoo. If the message is not deleted by the subscriber, the account is below the maximum limit, and the subscriber accesses the account

periodically, that message can remain on Yahoo's servers indefinitely;

e. When the subscriber sends an e-mail, it is initiated at the user's computer, transferred via the Internet to Yahoo's servers, and then transmitted to its end destination. Yahoo users have the option of saving a copy of the e-mail sent. Unless the sender of the e-mail specifically deletes the e-mail from the Yahoo server, the e-mail can remain on the system indefinitely;

f. A Yahoo subscriber can store files, including e-mails and image files, on servers maintained and/or owned by Yahoo;

g. A subscriber to Yahoo may not store copies on his/her home computer of e-mails and image files stored in his/her Yahoo account. The subscriber may store e-mails and/or other files on the Yahoo server for which there is insufficient storage space in the subscriber's computer and/or which he/she does not wish to maintain in the computer in his/her residence. A search of the files in the computer in the subscriber's residence will not necessarily uncover the files that the subscriber has stored on the Yahoo server;

h. As a federal agent, I am trained and experienced in identifying communications relevant to the crimes under investigation. The personnel of Yahoo are not. I also know that the manner in which the data is preserved and analyzed may be critical to the successful prosecution of any case based upon this evidence. Computer Forensic Examiners are trained to handle digital evidence. Yahoo employees are not. It would be inappropriate and impractical, however, for federal agents to search the vast computer network of Yahoo for the relevant accounts and then to analyze the contents of those accounts on the premises

of Yahoo. The impact on Yahoo's business would be severe;

i. In order to accomplish the objective of the search warrant with a minimum of interference with the business activities of Yahoo, to protect the rights of the subject of the investigation and to effectively pursue this investigation, the government is hereby seeking to direct Yahoo to make a digital copy of the entire contents of the information subject to seizure specified in Section II of Attachment A. That copy will be provided to me or to any authorized federal agent. The contents will then be analyzed to identify records and information subject to seizure pursuant to Section III of Attachment A; and

j. Executing a warrant to search a Yahoo e-mail account requires an approach similar to the standard approach for executing a warrant to search papers stored in a file cabinet. Searching the subject e-mail account in this case for evidence of the target crimes will require that agents cursorily inspect all e-mails produced by Yahoo in order to ascertain which contain evidence of those crimes, just as it is necessary for agents executing a warrant to search a filing cabinet to conduct a preliminary inspection of its entire contents in order to determine the documents which fall within the scope of the warrant. In addition, keyword searches alone are inadequate to ensure that law enforcement can discover all information subject to seizure pursuant to Section III of Attachment A. Keywords search text, but many common electronic mail, database and spreadsheet applications files (which files may have been attached to electronic mail) do not store data as searchable text.

#### **E. Stored Wire and Electronic Communication Access**

8. 18 U.S.C. §§ 2701-2711, is entitled "Stored Wire and Electronic Communications and Transactional Records Access."

a. 18 U.S.C. § 2703(a) provides, in part:

A governmental entity may require the disclosure by a provider of electronic communication service of the contents of a wire or electronic communication, that is in electronic storage in an electronic communications system for one hundred and eighty days or less, only pursuant to a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court with jurisdiction over the offense under investigation or equivalent State warrant. A governmental entity may require the disclosure by a provider of electronic communications services of the contents of a wire or electronic communication that has been in electronic storage in an electronic communications system for more than one hundred and eighty days by the means available under subsection (b) of this section.

b. Title 18, United States Code, Section 2703(b) provides, in part:

(1) A governmental entity may require a provider of remote computing service to disclose the contents of any wire or electronic communication to which this paragraph is made applicable by paragraph (2) of this subsection –

(A) without required notice to the subscriber or customer, if the governmental entity obtains a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court with jurisdiction over the offense under investigation or equivalent State warrant...

(2) Paragraph (1) is applicable with respect to any wire or electronic communication that is held or maintained on that service –



(A) on behalf of, and received by means of electronic transmission from (or created by means of computer processing of communications received by means of electronic transmission from), a subscriber or customer of such remote computing service; and

(B) solely for the purpose of providing storage or computer processing services to such subscriber or customer, if the provider is not authorized to access the contents of any such communications for purposes of providing any services other than storage or computer processing.

c. The government may also obtain records and other information pertaining to a subscriber to or customer of electronic communication service or remote computing service by way of a search warrant. 18 U.S.C. § 2703(c)(1)(A). No notice to the subscriber or customer is required. 18 U.S.C. § 2703(c)(3).

d. 18 U.S.C. § 2711, provides, in part:

As used in this chapter —

(1) the terms defined in section 2510 of this title have, respectively, the definitions given such terms in that section; and

(2) the term "remote computing service" means the provision to the public of computer storage or processing services by means of an electronic communications system.

e. 18 U.S.C. § 2510, provides, in part:

(8) "contents," when used with respect to any

wire, oral, or electronic communication, includes any information concerning the substance, purport, or meaning of that communication; . . .

(14) "electronic communications system" means any wire, radio, electromagnetic, photooptical or photoelectronic facilities for the transmission of electronic communications, and any computer facilities or related electronic equipment for the electronic storage of such communications; . . .

(15) "electronic communication service" means any service which provides to users thereof the ability to send or receive wire or electronic communications; . . .

(17) "electronic storage" means --

(A) any temporary, intermediate storage of a wire or electronic communication incidental to the electronic transmission thereof; and

(B) any storage of such communication by an electronic communication service for purposes of backup protection of such communication.

**F. Source of Information Contained Herein**

9. The statements in this affidavit are based upon my experience and background as a Special Agent, my own personal investigation of these matters, and the investigation I have conducted to date. I have personally conducted interviews of witnesses and reviewed numerous documents relevant to the criminal allegations contained in this affidavit.

10. Because this affidavit is being submitted for the limited purpose of securing a

search warrant, I have not included each and every fact known to me or known to the government concerning this investigation.

**G. Probable Cause**

11. For the reasons set forth below, there is probable cause to believe that evidence of the violation of 18 U.S.C. § 666 will be located in the records of Yahoo relating to the e-mail account, E\_Tonia@yahoo.com. The investigation presents probable cause of a conspiracy among four potential targets in the theft of federal funds.

**Background**

12. Liberia is currently emerging from a 14 year civil conflict which began as a civil war in 1989. As a result of the civil war, over 250,000 people of the country's three million people lost their lives, the country's basic infrastructure was destroyed, and its productive capacities supporting the economy nearly collapsed.

13. In March 2005, USAID Office of Food for Peace (FFP) approved funding to Catholic Relief Services (CRS) in support of the Food Support for Community Resettlement and Rehabilitation program (CRRP) implemented in FY05 to mid-FY07. The program was designed to meet the immediate needs of resettling populations and vulnerable families in highly war-affected communities as well as providing support for successful resettlement through infrastructure rehabilitation. The CRRP targeted 40,000 war-affected households in the areas of highest return.

14. To achieve CRRP goals, Catholic Relief Services sub-awarded cash and commodities to the three U.S.-based non-governmental organizations: World Vision, Africare, and Samaritan's Purse. In order to revitalize vulnerable communities, the Catholic Relief Services-lead consortium implemented Food-for-Work (FFW) infrastructure rehabilitation activities. The infrastructure activities were based on a community needs assessment and included road rehabilitation, and reconstruction of wells, hand pumps and latrines. The CRRP provided food commodities, tools and construction materials to support the FFW projects. Under the CRRP, each consortium partner was responsible for the implementation of the program in its given geographic areas.

15. USAID Office for Foreign Disaster Assistance (OFDA) also provided funding to the CRRP through a separate award. Over the life of the CRRP, FFP obligated approximately \$6.6 million in cash for administration and transportation costs and approximately \$5 million in commodities; OFDA obligated \$1.9 million. CRS received CRRP funding directly from USAID which it then disbursed to its sub-recipient partners (including World Vision Liberia).

16. On January 25, 2005, Catholic Relief Services awarded to World Vision Liberia a \$1.24 million sub-grant under the CRRP for the delivery of 3,250 metric tons of food commodities intended to reach 6,400 Liberian families.

17. Interviews of FFP, World Vision, and Catholic Relief Services representatives indicate the general CRRP food distribution process to be as follows:

- (1) FFP procured U.S. commodities through the United States Department of

Agriculture. U.S. domestic freight forwarders transported the commodities from the U.S. to the Monrovia Freeport in Liberia.

- (2) The Senior Commodity Officer, World Vision Liberia, was required to submit a monthly food distribution plan for CRS' approval. The distribution plan was supposed to identify the recipient communities, the quantities of food to be delivered, and the number of beneficiaries in each community who would receive the food rations.
- (3) Once that distribution plan was approved, the Port warehouse released the food to World Vision Liberia.
- (4) After food was delivered and disbursed to the intended recipients, World Vision Liberia was required to submit "food monitor reports" to CRS. These reports were to include a "beneficiary list" with the name and thumbprint of each recipient.

18. In its proposed distribution plans, World Vision Liberia accounted for every person who was expected to receive food from the CRRP through beneficiary lists. World Vision Liberia maintained beneficiary lists for each community, identifying each purported aid recipient by name. As many as 300 recipients could be identified on a beneficiary list for one community. On the beneficiary lists submitted by World Vision Liberia, each recipient provided a signature or thumbprint beside his or her written name and the recorded amount of food received. The World Vision Liberia food monitors were responsible for performing the food distributions at the delivery sites and completing the beneficiary lists during the

disbursement of food rations. As explained below, investigation by internal auditors and government agents has revealed that these beneficiary lists were fraudulent.

**The Initial Fraud Report and the  
World Vision Liberia Investigation**

19. On January 29, 2008, Food for Peace Officer, USAID Mission in Dakar, Senegal, forwarded a formal notification to the USAID/OIG that CRS submitted to the USAID Food for Peace, Democracy, Conflict, and Humanitarian Assistance/Food for Peace. Catholic Relief Services reported a significant commodity loss as a result of suspected criminal activity by World Vision Liberia employees. In response, World Vision Liberia conducted an internal investigation into allegations of potential fraud and abuse.

20. The World Vision audit examined the World Vision Liberia food distribution for the two-year grant period, from January 2005 until January 2007. The audit report did not provide an estimate of the total commodity loss; however, the audit concluded that up to 91% of the food acknowledged as received by World Vision Liberia never reached the intended recipients and that CRRP World Vision Liberia employees diverted the food with fraudulent intent. On May 19, 2008, Legal Counsel for World Vision, estimated the total commodity loss to be \$884,681; she estimated the total loss including ocean freight to be \$1.45 million. On July 29, 2008, Catholic Relief Services filed a claim against World Vision for CRRP commodity losses amounting to \$1.4 million.

21. The World Vision audit report identified the primary perpetrators of the

alleged fraud as:

Morris B. Fahnbulleh, Senior Commodity Officer

Thomas Parker, Project Officer

Joseph Bondo, FFW Officer

22. The World Vision auditors interviewed former World Vision Liberia employees who provided statements sworn before a Liberian County Notary. The former employees stated that Fahnbulleh, Bondo, and Parker, directed the staff to create fictitious beneficiary lists and supply their own thumbprints to the lists of fictitious beneficiaries. The auditors interviewed town members and officials who also confirmed that CRRP employees distributed to the towns only 9% of food commodities acknowledged to be received from World Vision Liberia. World Vision reported additional findings that (a) most of the beneficiary lists submitted to CRS by World Vision Liberia appeared to be fabricated, (b) some "distributions" were purportedly delivered to towns that Liberia county officials indicated do not exist, and (c) certain FFW projects that World Vision Liberia previously claimed as completed were not.

#### **The USAID Investigation**

23. In response to the World Vision audit, the USAID initiated its own investigation into the allegations of theft from the CRRP. From July 9-July 23, 2008, I conducted witness interviews of former World Vision Liberia employees. On July 10, 2008, I interviewed \_\_\_\_\_, former CRRP food monitor employed by World Vision Liberia

from March 2005 until January 2007. During employment from March 2005 until January 2007, told me that she created fake names and used her own thumb prints on the beneficiary lists at the instruction of Bondo and Parker. told me that sometimes Bondo and Parker directed them to create 500 fictitious beneficiary names at one time and if anyone disagreed with the orders, Parker threatened that they would lose their jobs. told me that sometimes Bondo took the beneficiary lists to his home or office to create fictitious names and thumbprints himself.

24. identified to the USAID/OIG examples of documents where she created the fictitious names and provided her thumbprints to represent the beneficiaries.

informed me that most or all of the CRRP documents are fraudulent, that the majority of the community projects were never completed, and that food distributions were never conducted.

25. informed me that it was common knowledge at World Vision Liberia that Fahnbulleh, Bondo, and Parker sold the food on the local market and used the money to build their private residences.

26. On July 11, 2008, I interviewed former CRRP food monitor employed by World Vision Liberia. informed me that approximately 10% of the food received at the Monrovia Port was actually delivered to the communities. informed me that the majority of the food from each shipment remained at the Monrovia Port to be sold on the local market.

27. On the same date, I accompanied to the World Vision Liberia office



where the CRRP files are currently maintained. I estimated there to be 200 to 300 hundred binders containing CRRP beneficiary lists, food distribution, and food monitoring reports.

informed me that all the beneficiary lists and files at the World Vision Liberia office were "fake." informed me that he created these "fake" beneficiary lists and provided his thumbprints on the beneficiary lists at the direction of Bondo and Parker.

28. informed me that Parker, who had primary responsibility for purchasing constructions supplies for the CRRP, purchased more construction materials than were actually needed for the CRRP project sites. explained to me that the quantities of the construction materials that appeared on the supplier's manifest were always greater than the amount which he carried into the field. informed me that per instruction of Parker, he delivered materials intended for the CRRP project sites to the private residences of Bondo, Fahnbulleh, Parker, and the former World Vision Liberia Executive Director, Etomonia David Tarpeh.

29. On July 11, 2008, I accompanied to identify the private properties of Bondo, Fahnbulleh, and Parker. I observed and photographed three houses that identified to be Bondo's; four houses identified to be originally owned by Fahnbulleh; and four houses identified to be owned by Parker.

30. On July 17, 2008, I interviewed, former CRRP Development Facilitator employed by World Vision Liberia from 2004-2006. informed me that he accompanied the World Vision auditors during the June 2007 review when World Vision discovered that most of the CRRP projects were not completed. told me that Bondo

instructed him to coordinate World Vision Liberia staff to work on the private properties of Fahnbulleh, Bondo, and Parker rather than on CRRP projects. identified

as a water and sanitation technician employed by World Vision Liberia who spent CRRP work hours performing work at the Director Tarpeh's private property.

informed me that for two years, Parker forced him to sign the fictitious food monitor reports falsely verifying food distribution purportedly performed by World Vision Liberia monitors that never happened.

31. On August 19, 2008, I interviewed former water and sanitation technician employed by World Vision Liberia from July 2004 until December 2006. reported that he installed hand pumps at the private residences of Bondo, Parker, and Ms. Tarpeh. believed that the raw materials for the hand pumps were supplied to World Vision Liberia from CRS as part of the CRRP and were intended to be used for FFW projects. As a general procedure, requested the raw materials for the CRRP community projects from Parker who sent a World Vision vehicle with the materials to the project site. requested the raw materials from Parker for the construction work at the private properties of Bondo, Parker, and Ms. Tarpeh. informed me that Parker sent a World Vision vehicle to deliver the raw materials to the private properties. Bondo, Parker, and Tarpeh never compensated for his personal time providing labor. estimated he spent more than 40 hours at Parker's residence, 40 hours at Bondo's residence, and 120 hours at Ms. Tarpeh's residence.

32. On August 19, 2008, accompanied me to Ms. Tarpeh's private farm in

Dwazon, Liberia.                      showed me the handpump which he installed on Tarpeh's farm.

                    informed me that Parker sent a driver from World Vision Liberia to deliver construction materials to Ms. Tarpeh's private farm.                      estimated that the handpump installation required 8 bags of cement, a handpump, and 15 well covers. I collected photographs of Ms. Tarpeh's private property.

33.    On July 11, 2008,                      informed me that he delivered 15-16 well covers to Ms. Tarpeh's private farm. On August 30, 2008, SA Huang presented photographs of Ms. Tarpeh's private property in Dwazon, Liberia.                      confirmed that he delivered the 15-16 well covers directly from the vendor to the photographed site.

34.    On July 17, 2008, I interviewed                      former CRRP latrine construction technician employed by World Vision Liberia from 2004 until January 2007.

                    informed me that                      did not deliver the exact quantities of materials recorded on the supplier's manifests to the project sites.                      reported to me that the quantities on the supplier manifests were often inflated.

35.    As an example,                      explained to me that if he estimated that 400 blocks were required to complete a project, Parker created a fake estimate for 800 blocks.                      said Parker forced him to sign for the false amounts and threatened to fire him if he did not comply.

36.                      informed me that Fahnbulleh and Parker requested him to provide CRRP technicians to perform work on their private residences.                      told me that he laid cement blocks on Parker's property during the construction of one of Parker's homes.

performed this construction work during his normal workday hours as a World Vision Liberia employee assigned to the CRRP.

37. On July 10, 2008, I interviewed [redacted] former CRRP food monitor employed by World Vision Liberia from June 2005 until January 2007. [redacted] informed me that he was present at the Monrovia Port when the food commodities were diverted. [redacted] described the food diversion scheme as a syndicate consisting of individuals from World Vision Liberia, CRS/Liberia, and the Giant Trucking Company. [redacted] further reported to me that the Giant Truck drivers drove to an agreed upon meeting point after exiting the Monrovia Port. Parker and Bondo were present at the meeting point and determined the amount of food that would be delivered to the field and the amount to be diverted and distributed to private customers. [redacted] informed me that there were individuals at the Monrovia Port who regularly sought customers to purchase the food. [redacted] told me that the food commodity transactions were in cash and sold outside the Monrovia Port in the local markets. [redacted] reported to me that he transported only about 30% of the food commodities to the World Vision warehouse and CRRP communities.

38. On July 14, 2008, I interviewed [redacted] former water and sanitation technician employed by World Vision Liberia from 2004 until January 2006. [redacted] informed me that he and other World Vision Liberia technicians worked on Fahnbulleh, Parker, and Morris's homes. [redacted] told me that the three supervisors diverted construction materials intended for CRRP project sites to their homes.

39. [redacted] reported that during work hours for the period 2004 to 2006, World

Vision Liberia employees worked on the private residences of Bondo, Parker, and Fahnbulleh.

40. On July 14, 2008, I accompanied [redacted] to identify the private properties of Fahnbulleh, Bondo, and Parker. The properties presented to me by [redacted] were the same properties shown to me by [redacted]

41. On July 23, 2008, [redacted] telephoned me to report a conversation between Parker and Bondo during his presence. [redacted] informed me that Parker and Bondo were discussing the USAID/OIG investigation, Parker was "scared" and Bondo and Parker were creating a "plan." I perceived [redacted] reference to "plan" to mean a fictitious story designed to minimize or cover-up Bondo and Parkers' criminal conduct. [redacted] claimed he was calling me while [redacted] was with Parker and Bondo and therefore could not provide further details.

42. On August 8, 2008, I interviewed [redacted] the former World Vision Liberia Finance Manager. [redacted] informed me that in early 2007, he brought the CRRP potential fraud issues to the attention of the former Director Tarpeh, on two separate occasions. [redacted] informed me that initially she accused him of trying to destroy the CRRP. The second time [redacted] raised the same concerns, Tarpeh expressed surprise; however, did not take any remedial action in response.

43. Ms. Tarpeh served as the Executive Director of World Vision Liberia throughout the period of the fraud that occurred during 2005 through 2007. In that capacity, she had oversight responsibility for the day-to-day management of the CRRP and supervisory

authority over Bondo, Fahnbulleh, and Parker.

#### **Use of E-mail by Bondo, Fahnbulleh, Parker, and Tarpeh**

44. In April 2008, World Vision provided USAID/OIG with the personnel records of Fahnbulleh, Bondo, and Parker. From the records, USAID/OIG obtained the email addresses, **tompark63@yahoo.com** for Parker and **mbefahnbulleh@yahoo.com** for Fahnbulleh. There was no record of a personal email address in Bondo's personnel record. The personnel records indicate that Parker and Fahnbulleh had these e-mail accounts as early as July 2004. The USAID/OIG investigation indicates that Parker and Fahnbulleh still maintain these personal e-mail accounts.

45. On July 21, 2008, during a consensual interview, Bondo provided the USAID/OIG with his current email address: **joe\_o\_bondo@yahoo.com**.

46. On July 16, 2008, I interviewed \_\_\_\_\_ former Commodity Tracking Systems Officer for World Vision Liberia. \_\_\_\_\_ informed me that Fahnbulleh corresponded with her via email since his arrival in the U.S. in September 2007. \_\_\_\_\_ informed me that the last time she received an email from Fahnbulleh was in the beginning of 2008. \_\_\_\_\_ provided Fahnbulleh's email addresses from which he wrote to her in 2007 and 2008: **mbefahnbulleh@aol.com** and **mbefahnbulleh@yahoo.com**.

47. During the initial course of the investigation, the USAID/OIG requested email correspondence from the World Vision email accounts of Fahnbulleh, Bondo, Parker, and Tarpeh, the former Executive Director, World Vision Liberia. To date, USAID/OIG has

received email records from World Vision for Parker.

48. On August 8, 2008, I discussed the contents of the email files with Legal Counsel, World Vision. informed me that she reviewed all emails prior to furnishing them to USAID/OIG. commented that Parker's account contained approximately 675 emails which considered to be a small amount for a two-year period. believed that Parker deleted most of his email files before the CRRP closed on January 31, 2007.

49. informed USAID/OIG that Fahnbulleh left a large amount of emails in his World Vision account; however, only five between himself and Parker. considered this extremely peculiar since their job responsibilities required close and frequent communication between each other.

50. On July 22, 2008, showed me one email in Parker's World Vision email account that Parker might have forgotten to delete. provided the email to me to review. From reading the email, I perceived that Fahnbulleh and Parker were discussing private construction work performed with CRRP funds.

51. On August 13, 2008, I interviewed World Vision's West Africa Regional Director from 1998 until October 2006. informed me that he communicates with Etomonia Tarpeh, the former World Vision Liberia Executive Director, through her personal email address. told me that the last time Tarpeh wrote to him from her personal email account was in October 2007. provided me with Tarpeh's personal email address, E\_Tonia@yahoo.com. informed me that the former Director Tarpeh

never raised any issues to him concerning the CRRP.            stated if Tarpeh was aware of the potential fraud, as the Executive Director, she should have notified him about it especially since the potential loss was enormous.

52.    Based on my training and experience in investigating financial crimes, I understand that it is not uncommon for co-conspirators to engage in communications with each other regarding their criminal activities using personal e-mail accounts rather than their employer's work-issued e-mail account. It is also common for persons engaged in financial crimes to use their personal e-mail account as an account of record for personal financial transactions, such as correspondence with banks and financial services providers; records of those transactions may constitute relevant evidence of money laundering, hidden assets, or other attempts to hide the proceeds of their criminal activity.

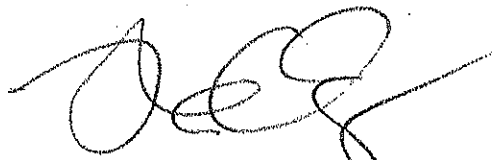
#### **H.    Conclusion**

53.    Based upon the information above, I have probable cause to believe that on the computer systems owned, maintained, and/or operated by Yahoo, headquartered at 701 First Avenue, Sunnyvale, California, there exists evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 666. By this affidavit and application, I request that the Court issue a search warrant directed to Yahoo allowing agents to seize the e-mail and other information stored on the Yahoo servers for the computer accounts and files and following the search procedure described in Attachment A.



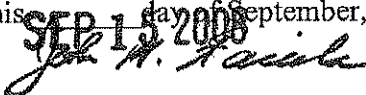
**I. Request for Sealing and Non-Disclosure Order**

54. Since this investigation is continuing, disclosure of the search warrant, this affidavit, and/or this application and the attachments thereto will jeopardize the progress of the investigation. Accordingly, I request that the Court issue an order that the search warrant, this affidavit in support of application for search warrant, the application for search warrant, and all attachments thereto be filed under seal until further order of this Court. In addition, because notification of the existence of this order will seriously jeopardize the ongoing investigation, I request that the Court issue an order pursuant to 18 U.S.C. § 2705(b) ordering Yahoo not to notify any person of the existence of the warrant.



Special Agent Mai Huang  
USAID Office of the Inspector General

Sworn to and subscribed before me  
on this 15 day of September, 2008



The Honorable John M. Facciola  
United States Magistrate Judge

## **ATTACHMENT A**

### **I. Search Procedure**

a. The search warrant will be presented to Yahoo personnel who will be directed to isolate those accounts and files described in Section II below;

b. In order to minimize any disruption of computer service to innocent third parties, Yahoo employees will create an exact duplicate of the computer accounts and files described in Section II below, including an exact duplicate of all information stored in the computer accounts and files described therein. With Yahoo's consent, law enforcement personnel trained in the operation of computers may provide support for this process and/or may create the exact duplicate described above;

c. Yahoo employees will provide the exact duplicate in electronic form of the accounts and files described in Section II below and all information stored in those accounts and files to the agent who serves the search warrant; and

d. Law enforcement personnel will thereafter review all information and records received from Yahoo employees to determine the information to be seized by law enforcement personnel specified in Section III of Attachment A.

### **II. Files and Accounts to be Copied by Yahoo Employees**

a. All electronic mail stored and presently contained in, or on behalf of, the following electronic mail addresses and/or individual accounts:

**E\_Tonia@yahoo.com**

b. All existing printouts from original storage of all of the electronic mail described above in Section II (a);

c. All transactional information of all activity of the electronic mail addresses and/or individual accounts described above in Section II(a), including log files, dates, times, methods of connecting, ports, dial-ups, and/or locations;

d. All business records and subscriber information, in any form kept, pertaining to the electronic mail addresses and/or individual accounts described above in Section II(a), including applications, subscribers' full names, all screen names associated with the subscribers and/or accounts, all account names associated with the subscribers, methods of payment, telephone numbers, addresses, and detailed billing records; and

e. All records indicating the services available to subscribers of the electronic mail addresses and/or individual accounts described above in Section II(a).

### **III. Information to be Seized by Law Enforcement Personnel**

a. All communications by the account holder that relate to the criminal allegations described in the foregoing affidavit and/or any attempts by the co-conspirators to hinder, obstruct, or impede the government's investigation of those criminal allegations;

b. All printouts from original storage that constitute communications by the account holder that relate to the criminal allegations described in the foregoing affidavit and/or any attempts by the co-conspirators to hinder, obstruct, or impede the government's investigation of those criminal allegations; and

c. All of the records and information described above in Sections II (c), (d), and (e).